

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

-----x
A.T., a minor, by and through his parent and
natural guardian SHA-KEEMA TILLMAN,
et al., on behalf of themselves and all others
similarly situated,
-----x

Plaintiffs,

17-CV-0817 (DNH) (DEP)

v.
-----x

DAVID HARDER, Broome County Sheriff, in his
official capacity, et al.
-----x

Defendants.
-----x

**NOTICE OF JOINT MOTION FOR
PRELIMINARY APPROVAL OF CLASS-ACTION SETTLEMENT, AND APPROVAL
AND DISTRIBUTION OF THE NOTICE OF SETTLEMENT**

PLEASE TAKE NOTICE that pursuant to Rule 23 of the Federal Rules of Civil Procedure, the plaintiffs and defendants will jointly move this Court, at 10 Broad Street, Utica, New York, on a date and at a time set by the Court, to grant preliminary approval of the proposed settlement agreement attached as Exhibit 1 to this Notice; approve the form of the class notice, and direct the Broome County Sheriff's Office to provide notice to all class members; provide class members with thirty days after Notice is posted and served to comment on the proposed settlement as specified in the Notice; and set a date for a fairness hearing for final approval of the settlement.

Date: July 9, 2018
Syracuse, N.Y.

Respectfully submitted,

/s/Joshua Cotter

Joshua T. Cotter, Esq.
Susan M. Young, Esq.
George Haddad, Esq.
Samuel C. Young, Esq.
LEGAL SERVICES OF CENTRAL NEW YORK
221 S. Warren Street
Syracuse, New York 13202
Tel: (315) 703-6500
jcotter@lscny.org
syoung@lscny.org
samyoung@lscny.org

/s/ Robert Behnke

Robert Behnke, Esq.
Broome County, Department of Law
Broome County Office Building, 6th Floor
60 Hawley St.
Binghamton, New York 13902
Tel. (607)-778-2117
RBehnke.co.broome.ny.us

Attorney for the Sheriff's Office Defendants

Attorneys for Plaintiffs